

**F I L E D**

JUL 16 2008

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF ILLINOIS  
 EASTERN DIVISION

UNITED STATES OF AMERICA	)	MAGISTRATE JUDGE MORTON DENLOW
v.	)	
MICHAEL KING,	)	
CLAUDE MCKAY III	)	
	)	
	)	Magistrate Judge
	)	Morton Denlow
	)	08 CR 561
	)	

**GOVERNMENT'S MOTION TO SEAL  
 COMPLAINT, AFFIDAVIT, SEIZURE AND ARREST WARRANTS**

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal Complaint, Affidavit, Arrest Warrants, Search Warrants, Seizure Warrants and Orders. Special Agent Eric Durante of the United States Drug Enforcement Administration is the primary source of information for the Complaint, Affidavit, Search Warrants, Seizure Warrants and Arrest Warrants. The Affidavit details the facts supporting probable cause that defendants MICHAEL KING, and CLAUDE MCKAY III have violated federal criminal law, including conspiracy to knowingly and intentionally possess with intent to distribute a controlled substance, namely, one kilogram or more of mixtures containing heroin, a Schedule I Controlled Substance, and five kilograms or more of mixtures containing cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. Section 846. If the defendants were made aware of the facts contained in the Affidavit and of the issuance of the Arrest, Search and Seizure Warrants, then the investigation and the execution of the Arrest, Search and Seizure Warrants would be jeopardized.

For the foregoing reason, the government respectfully requests that the Complaint, Affidavit, Arrest Warrants, Search Warrants, Seizure Warrants and Orders be sealed until the initial appearance

of the first of the Arrest Warrants in this case, but no later than August 18, 2008.

Respectfully submitted,

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By:

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DATE: JULY 16, 2008